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C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
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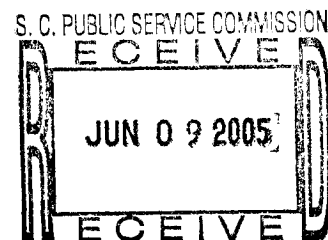
Phone: (803) 737-0800
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DAN FARNETT
CHIEF OF STAFF

June 7, 2005

VIA U.S. MAIL

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210



Re: Duke Power - Annual Review of Base Rates for Fuel Costs.
Docket No. 2005-3-E

Dear Mr. Terreni:

For your docket, please find enclosed a copy of the Office of Regulatory Staff's First Continuing Data Request which was served on counsel for the Applicant. Please date stamp the extra copy enclosed and return it to me via our courier.

Please let me know if you have any questions.

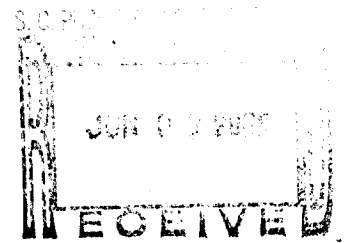
Sincerely,

C. Lessie Hammonds

Enclosures

cc: Lara Simmons Nichols, Esquire
Richard L. Whitt, Esquire
Scott Elliott, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-3-E



IN RE:

Duke Power – Annual Review of)
Base Rates for Fuel Costs)
)
_____)

CERTIFICATE OF SERVICE

This is to certify that I, Rena Grant, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **FIRST CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Lara Simmons Nichols, Assistant General Counsel
Duke Energy Corporation
Post Office Box 1244 (PB05E)
Charlotte, NC 28201

Richard L. Whitt, Esquire
Austin, Lewis & Rogers, P.A.
Post Office Box 11716
Columbia, SC 29211

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205

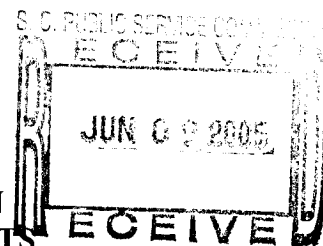
Rena Grant

June 7, 2005
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-3-E

IN RE: Duke Power Company)
Annual Review of Base Rates)
for Fuel Costs)
_____)

INFORMATION
DATA REQUESTS
SET NO. 1



TO: LARA S. NICHOLS, ATTORNEY FOR DUKE ENERGY CORPORATION:

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the within Data Requests upon Duke Power Company (hereafter referred to as "Duke" or "Company").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy

of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to Duke's South Carolina Electric Retail Operations for the period under review in this docket.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Jay Jashinsky or John W. Flitter, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.

- IX. That Duke provides six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that Duke provides an electronic version of the responses.
- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of Duke's responses, the Duke witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require Duke to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUESTS:

- 1-1 Please provide copies of any Duke correspondence, request for data and responses, oral or written, from any other parties in this Docket.
- 1-2 Please provide a hard copy of Duke's FERC Form 1 for the last two years, and if available, please provide copies in electronic form.
- 1-3 Please provide a copy of all exhibits, schedules and work-papers used to develop the Company's 2005 filing in this proceeding.
- 1-4 Please provide a detailed analysis of monthly over/under recovery of fuel costs for the actual and forecasted period under review.
- 1-5 For each actual month during the period under review, please provide a variance analysis of actual MWH sales and fuel costs with forecasted amounts used in the 2004 filing. In this response explain all variances greater than $\pm 5.0\%$.
- 1-6 Please identify and provide the monthly amount of all wheeling costs included in the current filing.
- 1-7 Has Duke used or applied an avoided cost proxy for purposes of this filing? If yes, please provide a comparison of actual and proxy costs.
- 1-8 Please provide monthly and annual (most recent calendar year) actual capacity and availability factors by unit for the period under review.

1-9 For each generating unit, please provide the following for each month for the period under review:

- (a) Maximum Dependable Capacity (MDC) or summer capacity rating (MW);
- (b) gross and net energy output (MWH);
- (c) quantity of fuel consumed by type; and
- (d) cost of fuel by type.

1-10 For each month during the period under review, please provide the following:

- (a) net system generation (MWH);
- (b) system purchases (MWH);
- (c) MWH sales to retail customers (net of line losses) by state jurisdiction;
and
- (d) MWH wholesale sales (net of line losses) by customer.

In this response, please reconcile any differences to the MWH amounts to be shown in Duke's filing.

1-11 Does Duke have any real time pricing contracts in which energy charges are based on hourly fuel costs or hourly system lambdas? If the answer is yes, identify such contracts/customers and explain how these sales and fuel costs are treated for purposes of this filing.

1-12 Please provide a narrative description of any changes during the actual and forecasted period to individual contracts by supplier for the purchase of all fossil fuels, including railroad delivery contracts.

1-13 Does Duke purchase fuel, fuel supplements, or transportation from any affiliate or entity in which Duke has financial interest? If the answer is yes, please provide a copy of all contracts (affiliates and non-affiliates) for such fuel or supplements (e.g., synfuel), and monthly volumes and prices for the period under review.

1-14 For the period under review, please provide the following with respect to all scheduled and forced outages lasting longer than 24 hours (please designate scheduled or forced):

- (a) name of unit;
- (b) dates and duration of outage;
- (c) estimated net energy that would have been generated by the unit absent the outage;
- (d) cause of outage;
- (e) corrective action to return unit to service;
- (f) source(s) of replacement power;
- (g) estimate or calculation of additional fuel and/or purchased power costs resulting from the outage with all supporting work-papers and documentation;

- (h) copy of all correspondence and reports to and from all regulatory bodies (e.g. NRC); and
- (i) all orders or other correspondence setting forth any action including any fines or penalties by regulatory authorities.

1-15 For the period under review, please provide the following with respect to all scheduled outages lasting longer than originally planned:

- (a) name of unit;
- (b) scheduled (planned) outage period;
- (c) actual outage period;
- (d) reason(s) for extended outage period longer than planned;
- (e) estimate or calculation of additional fuel and/or purchased power costs resulting from the extended outage with all supporting work-papers and documentation; and
- (f) copies of all reports and correspondence concerning the extended outage or delayed start up.

1-16 Please provide details concerning all re-ratings, both actual and projected for the period under review.

1-17 Please provide details of Duke's forecasted scheduled outages for the next twelve months by plant.

1-18 For the actual and forecasted period under review, please provide a schedule of power purchases that provides:

- (a) supplying party;
- (b) total energy purchased (MWH);
- (c) total energy price;
- (d) fuel energy price (as available);
- (e) capacity purchased (MW);
- (f) capacity price and cost;
- (g) FERC or state approved transmission charges;
- (h) ancillary transmission charges;
- (i) whether such purchase was on-peak or off-peak daily, weekly or monthly block purchase;
- (j) whether energy purchased was take or pay;
- (k) whether energy purchased was firm or interruptible; and
- (l) use of power (e.g. native load; off system sale, etc.).

1-19 Please provide detailed accounting (daily, weekly, or monthly) of the specific use for each purchased MWH for retail, off-system sale, wholesale, etc. including the total MWH's and purchase price from each supplier for the actual period under review.

- 1-20 Please provide a list of all (a) long-term (over 1 yr. in length) contracts and (b) short-term (up to 1 yr. in length) contracts to purchase fossil fuel together with price, quantity, quality and contract period.
- 1-21 Did Duke purchase any power from an affiliated supplier during the review period? If yes, please provide name of supplier, purchase amount and dollars paid, and a description of any other consideration or service given or promised in exchange for this purchased power.
- 1-22 Please explain Duke's treatment of off-system sales fuel costs and margins in determining fuel recovery balances.
- 1-23 Please provide off-system sales (MWH) and related total energy revenue and capacity revenue for each month during the actual period under review.
- 1-24 With regards to SO₂ Emission Allowance credits, please provide a report detailing the beginning balance, credits earned or purchased, credits used or sold, and the ending balance as of the end of the review period.
- 1-25 If this case includes costs resulting from recent amendments to Section 58-27-865(A) that are also included in base rates, quantify these amounts and explain Duke's proposal or plan to ensure no double recovery of such amounts.
- 1-26 If this case includes any capacity related costs, explain and provide all details relating to the assignment or allocation of these capacity costs to South Carolina for purposes of this filing.
- 1-27 Please provide any changes in transportation costs incurred during the review period, plus any projected changes over the next twelve months with narratives describing each actual and projected change.
- 1-28 Please provide a hard copy of Duke's monthly FERC Form 423 for the most recent 24 months available, and if available, please provide copies in electronic form.
- 1-29 Please provide the latest lifetime capacity factor for each nuclear power generation unit.
- 1-30 Please provide actual monthly generation percentages for the review period for fossil, nuclear, simple-cycle turbines, combined-cycle turbines, and hydroelectric.
- 1-31 Please provide the average fuel cost in cents per KWH, and total generation in MWH by plant for the actual review period.
- 1-32 Please provide the fuel costs in cents per KWH and SC retail energy sales in MWHs by month for the actual review period.

- 1-33 Please provide the estimated fuel costs and SC retail energy sales (MWH) by month for the succeeding forecasted twelve (12) month period.
- 1-34 Please continue to file with the Office of Regulatory Staff the monthly reports of information related to fuel costs as previously required by Public Service Commission order.
- 1-35 In reference to fossil fuel market data, please provide a list of any external publications, reports, documents or other sources such as conferences, seminars or meetings used by Duke to keep abreast of conditions in the market. Also, please provide a list or description of any internal data, reports, or other source materials used or reviewed by Duke in such endeavors.
- 1-36 Please provide the minimum coal quality requirements by plant, including but not limited to Btu, sulfur, ash and moisture content.
- 1-37 Please provide typical annual tonnage requirements by plant.
- 1-38 Please provide the Sarbanes-Oxley report for fossil/hydro for calendar year 2004.

June 7, 2005



C. Lessie Hammonds, Esquire
Office of Regulatory Staff
P.O. Box 11263
Columbia, South Carolina 29211
(803) 737-0877